

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

FIRST NIAGARA RISK
MANAGEMENT, INC.,

Plaintiff,

v.

THOMAS KOLONGOWSKI,

Defendant.

CIVIL ACTION NO. 16-0719

**INTERROGATORIES TO GARNISHEE CITIZENS BANK, N.A., IN AID OF
EXECUTION**

TO: Citizens Bank, N.A.
22 Turner Lane
West Chester, PA 19380

YOU ARE REQUIRED TO FILE ANSWERS WITH THE COURT UNDER OATH TO THE FOLLOWING INTERROGATORIES WITHIN TWENTY DAYS AFTER SERVICE UPON YOU. FAILURE TO DO SO MAY RESULT IN JUDGMENT AGAINST YOU.

1. From the date of the filing of the Complaint in the instant action (February 12, 2016), to the time you were served, or at any subsequent time, has the Defendant, either individually or jointly with any other party, maintained a checking, savings, commercial, or other type of account at your institution (including at any branch location of your institution), either as owner, agent, maker of or in any other capacity?

2. If the answer to Interrogatory No. 1 is "yes," state for each account:

- a) Name in which such was maintained;
- b) Names and addresses of all persons or entities having an interest therein;
- c) Names and addresses of all persons or entities authorized to draw thereon;
- d) Account number;
- e) Location of office where account maintained;
- f) Date opened;
- g) Dollar amount therein on date of service;
- h) Date and amount of each deposit or withdrawal therefrom after the date of service;
- i) Date of amount of each deposit or withdrawal from the account from the date of the filing of the Complaint in the instant action (February 12, 2016) to the date of service;

j) Any other information regarding deposits or withdrawals from the account from the date of the filing of the Complaint in the instant action (February 12, 2016) to the date of service;

3. From the date of the filing of the Complaint (February 12, 2016) to the date of service, did you have in your possession, custody or control (as fiduciary, trustee or otherwise) any property, tangible or intangible, in which the Defendant had any interest whatsoever, including, but not limited to, trust accounts, certificates of deposit, pledges, promissory notes, etc.?

4. If the answer to Interrogatory No. 3 is "yes," state:

- a) Brief description thereof;
- b) Location thereof;
- c) Date that you received the same;
- d) Dollar amount or value thereof;
- e) Terms upon which the property is being held;
- f) Names and addresses of all persons, entities or companies having an interest therein.

5. From the date of the filing of the Complaint (February 12, 2016) to the date of service, did you have a security interest in any property in which the Defendant had an interest either individually or jointly with any other party or were you holding any document of title or other collateral of any land as security for any loan or time purchase transaction in which your institution was a party?

6. If the answer to No. 5 is "yes," state for each loan:

- a) Names and addresses of parties thereto;
- b) Original loan amount and present balance owed;
- c) Amount of monthly payments and whether current;
- d) With regard to the collateral for such loan, the names and addresses of the owners thereof, a brief description thereof and the dollar amount of value thereof.